

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Joshua Cox,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Case No. 3: 13 CV 293
	:	
Healthcare Services Group, Inc.,	:	Judge Jack Zouhary
	:	
Defendant.	:	
	:	

MOTION FOR ADMISSION OF
BRAD M. KUSHNER *PRO HAC VICE*

Defendant Healthcare Services Group, Inc. (“Healthcare Services”) and its counsel, Felix C. Wade and Mary F. Geswein, move the Court pursuant to Local Rule 83.5(h) for an order admitting Brad M. Kushner to practice before this Court as co-counsel for Defendant Healthcare Services for the purposes of defending Plaintiff’s claims against Defendant Healthcare Services. The Affidavit attached to this Motion (and filed with the Court) demonstrates that Attorney Kushner is admitted to practice before and is a member in good standing of the bars of various federal courts in the United States, and in the State of Pennsylvania, and otherwise meets the requirements of Local Rule 83.5(h). Attorney Kushner is also familiar with the Federal Rules of Civil Procedure and the Federal Rules of Evidence. Based on the foregoing information, Defendant and its counsel, Felix C. Wade and Mary F. Geswein, respectfully request that Brad

M. Kushner of the law firm of Stevens & Lee, PC be permitted to practice before this Court as co-counsel for the purpose of representing Healthcare Services and participating in this action.

Respectfully submitted,

/s/ Mary F. Geswein

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Counsel for Defendant

Healthcare Services Group, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Pro Hac Vice* was filed via the Court's Electronic Filing System on February 27, 2013. Parties will be notified by the Court's Electronic Filing System.

/s/ Mary F. Geswein

Mary F. Geswein